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REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

Status of Claims

Claims 1 - 8 and 10 – 20 remain pending in the application. Claims 1 - 8 and 10 – 20 have been rejected. Claims 1, 8, 10 and 18 have been amended. Applicants respectfully assert that no new matter has been added.

CLAIM REJECTIONS

35 U.S.C. § 103 Rejections

In the Office Action, the Examiner rejected claims 1, 2, 4 – 8 and 10 - 20 under 35 U.S.C. § 103(a), as being unpatentable over Fernandez et al. (U.S. 6,697,103, herein after "Fernandez") in view of Johnson (US 6,275,855).

In the Office Action, the Examiner rejected claim 3 under 35 U.S.C. § 103(a), as being unpatentable over Fernandez et al (US Patent No. 6,697,103) in view of Monroe (Us Patent No. 6,246,320).

Claims 1, 8, 10 and 18 were amended to include, in paraphrase, the limitation of "install(ing) in real-time, after receiving an alert from one or more of said processing units, at least one of said content-analysis applications into at least one of said processing units based on at least one of said post-alert action rules".

> "To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to reference teachings. Second, there must be a reasonable

expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)" [MPEE §2142]

Applicants respectfully submit that the Examiner has not established a prima facie case of obviousness at least because the prior art references do not teach or suggest all the limitations of claims 1, 2, 4 – 8 and 10 - 20.

The Office action contended that "it would have been obvious to one having ordinary skill in the art at the time the invention was made to modify Fernandez invention according to the teaching of Johnson because it provides a processing unit (CPU) that automatically analyzes and validates alert information once an alarm event occurs, which can easily be implemented to the software storage modules of an integrated surveillance system" [emphasis added, see page 6 of the office action].

It is respectfully asserted that "automatically analyz[ing] and validat[ing] alert information once an alarm events occur, which can easily be implemented to the software storage modules" is by no means analogues to, for example, "installing, in real-time after receiving the alert, a content-analysis application into a video or audio processing unit from an application bank having content-analysis applications based on at least one of said predefined post-alert action rules", as claimed in claim 10.

Accordingly, even if, for the sake of arguments, it is assumed that the combination of the reference may be proper and that the above statement may be true, such a statement does not describe what is claimed in claims 1, 8, 10 and 18 and the combined teaching of the Fernandez and Johnson references does not teach or suggest all the limitations of the independent claims.

In particular, Fernandez and Johnson, alone or in combination do not teach or suggest "a control unit having installed therein a set of post-alert action rules, the control unit coupled to said processing units and to said application bank, said control unit instructs, based on at least one of said post-alert action rules, said application bank to install in real-time, after

receiving an alert from one or more of said processing units, at least one of said content-analysis applications into at least one of said processing units", as claimed in claim 1.

Likewise, Fernandez and Johnson, alone or in combination do not teach or suggest "to install in real-time after receiving the alert another one of said content-analysis applications into said processing unit according to at least one of said post-alert action rules", as claimed in claim 8.

Likewise, Fernandez and Johnson, alone or in combination do not teach or suggest "installing, in real-time after receiving the alert, a content-analysis application into a video or audio processing unit from an application bank having content-analysis applications based on at least one of said predefined post-alert action rules", as claimed in claim 10.

Likewise, Fernandez and Johnson, alone or in combination do not teach or suggest "instructing in real-time after receiving the notification said application bank to install at least one of said content-analysis applications into at least one of said processing units based on at least one of said pre defined post-alert action rules", as claimed in claim 18.

Applicants respectfully submit that the Office Action did not make out a prima facie case of obviousness, at least because the combination of the Fernandez and Johnson references does not teach or suggest all the claims limitations.

For the foregoing reasons, Applicant respectfully submits that independent claims 1, 8, 10 and 18 are not made obvious by the combination of Fernandez and Johnson.

Accordingly, Applicant respectfully submits that the independent claims 1, 8, 10 and 18 are allowable and requests that the 35 U.S.C. § 103(a) rejection of claims 1, 8, 10 and 18 be withdrawn.

Claims 2, 4– 7 and 11 - 17 are dependent, directly or indirectly, from one of claims 1 and 10, and include all the limitations of the parent claim. Therefore, the patentability of claims 2, 4– 7 and 11 - 17 follows directly from the patentability of one of claims 1 and 10. Therefore, applicant respectfully asserts that claims 2, 4– 7 and 11 - 17 are likewise allowable and requests that the rejection of claims 2, 4– 7 and 11 - 17 be withdrawn.

Claim 3

The combination of Fernandez and Johnson was discussed above with respect to claim 1 and is likewise applicable here. Monroe cannot cure the deficiencies of the combination of Fernandez and Johnson. Accordingly claim 1 is patentable over the combination of Monroe, Fernandez and Johnson. Claim 3 is dependent from claim 1 and includes all the limitations of claim 1. Therefore, the patentability of claim 3 follows directly from the patentability of claim 1. Therefore, applicant respectfully requests that the rejection of claim 3 be withdrawn.

CONCLUSIONS

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 50-3355.

Respectfully submitted,

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